

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMOUNT \$ 150-11
SUMMONS ISSUED 2
LOCAL RULE 4.1
WAIVER FORM
MCF ISSUED
BY DPTY. CLK.
DATE 8-27-04

JUDITH FONSECA
Plaintiff

v.

BROOKS PHARMACY, INC., and
MC WOONSOCKET, INC.,
Defendants

COMPLAINT and DEMAND
FOR TRIAL BY JURY

04 - 11870 WGY

JURISDICTION

MAGISTRATE JUDGE Alexander

The plaintiff in this action is a resident of the Commonwealth of Massachusetts, while the defendants are foreign corporations. Jurisdiction is, therefore, based upon the diversity of citizenship between the plaintiff and the defendants under 28 U.S.C. 1332.

COUNT I
AS AGAINST BROOKS PHARMACY, INC., IN WARRANTY

1. The Plaintiff, JUDITH FONSECA, is a resident of Fall River, Bristol County, and Commonwealth of Massachusetts.
2. The Defendant, BROOKS PHARMACY, INC., is a foreign corporation organized under the laws of the state of Delaware with a principal place of business at 50 Service Avenue, Warwick, Rhode Island and with a registered agent in Massachusetts namely National Corporate Research, LTD, located at 18 Tremont Street, Suite 148, Boston, Massachusetts.
3. The defendant was, on August 27, 2001 and all dates relevant hereto, engaged in the ownership, operation and control of a pharmacy at 933 Pleasant Street, Fall River, Bristol County, Massachusetts, where it offered for sale prescription drugs for human consumption.
4. On or about August 27, 2001 while the plaintiff was a patron at defendant's pharmacy, she caused a drug prescription to be filled out at said pharmacy.

5. The plaintiff ingested the drugs purchased from the defendant relying upon the defendant's express and implied warranties that the drugs she was ingesting were the drugs prescribed by her physician but, in fact, the drugs given to her by the defendant pharmacy and ingested by her according to the instructions printed by the defendant on the prescription bottle were not the drugs prescribed by her physician.

6. Upon the plaintiff's ingestion of the drugs given to her by the pharmacy, and as a direct and proximate result of the defendant's breach of said warranties, the plaintiff became violently ill, was caused to expend money for medical care and attention, was caused to require emergency room admission, was caused to be incapacitated from earning her livelihood, was caused lasting and permanent injuries, was caused loss of enjoyment of life, and was caused great mental anguish and was caused to be otherwise greatly damaged.

WHEREFORE, the plaintiff demands judgment against the defendant, BROOKS PHARMACY, INC., in an amount to be determined by the Court plus interest and costs of this

COUNT II
AS AGAINST BROOKS PHARMACY, INC., IN NEGLIGENCE

1. The Plaintiff, JUDITH FONSECA, is a resident of Fall River, Bristol County, and Commonwealth of Massachusetts.

2. The Defendant, BROOKS PHARMACY, INC., is a foreign corporation organized under the laws of the state of Delaware with a principal place of business at 50 Service Avenue, Warwick, Rhode Island and with a registered agent in Massachusetts namely National Corporate Research, LTD, located at 18 Tremont Street, Suite 148, Boston, Massachusetts.

3. The defendant was on August 27, 2001 and all dates relevant hereto was engaged in the ownership, operation and control of a pharmacy at 933 Pleasant Street, Fall River, Bristol County, Massachusetts, where it offered for sale prescription drugs for human consumption.

4. On or about August 27, 2001 while the plaintiff was a patron at defendant's pharmacy, she caused a drug prescription to be filled out at said pharmacy.

5. The defendant owed a duty to the plaintiff to exercise reasonable care in filling the plaintiff's prescription, in insuring that the medication provided to the plaintiff by the defendant was the same medication prescribed by her physician, in providing the plaintiff with the same instructions for ingesting the medication as those prescribed by her physician and, furthermore, the defendant owed a general duty to the plaintiff to exercise reasonable care under the circumstances so as to adequately and reasonably protect the plaintiff from foreseeable harm.

6. The plaintiff ingested the drugs purchased from the defendant relying upon the defendant's duty to exercise reasonable care in filling the prescription as the plaintiff's physician wrote it and in taking reasonable measures to ensure that the drugs she was ingesting were the drugs prescribed by her physician but, in fact, the drugs given to her by the defendant pharmacy and ingested by her in accordance with the instructions printed by the defendant on the prescription bottle were not the drugs prescribed by her physician.

7. Upon the plaintiff's ingestion of the drugs given to her by the pharmacy, and as a direct and proximate result of the defendant's breach of said warranties, the plaintiff became violently ill, was caused to expend money for medical care and attention, was caused to require emergency room admission, was caused to be incapacitated from earning her livelihood, was caused lasting and permanent injuries, was caused loss of enjoyment of life, and was caused great mental anguish and was caused to be otherwise greatly damaged.

8. The defendant breached its duty to exercise reasonable care in filling the plaintiff's prescription by negligently giving the wrong medication to the plaintiff and said negligence of the defendant was the direct and proximate cause of all the plaintiff's damages hereinabove and herein below mentioned.

9. As a direct and proximate result of the negligence of the defendant, and as a direct and proximate result of ingesting said drugs, the plaintiff became violently ill, was caused to

expend money for medical care and attention, was caused to require emergency room admission, was caused to be incapacitated from earning her livelihood, was caused lasting and permanent injuries, was caused loss of enjoyment of life, was caused great pain and anguish, and was caused to be otherwise greatly damaged.

WHEREFORE, the plaintiff demands judgment against the defendant, BROOKS PHARMACY, INC., in an amount to be determined by the Court plus interest and costs of this action.

COUNT I
AS AGAINST MC WOONSOCKET, INC., IN WARRANTY

1. The Plaintiff, JUDITH FONSECA, is a resident of Fall River, Bristol County, and Commonwealth of Massachusetts.

2. The Defendant, MC WOONSOCKET, INC., is a foreign corporation organized under the laws of the state of Rhode Island with a principal place of business at 50 Service Avenue, Warwick, Rhode Island and with a registered agent in Rhode Island namely Parasearch, Inc., 222 Jefferson Boulevard, Suite 200, Warwick, RI.

3. The defendant was on August 27, 2001 and all dates relevant hereto was engaged in the ownership, operation, and control of a pharmacy at 933 Pleasant Street, Fall River, Bristol County, Massachusetts, where it offered for sale prescription drugs for human consumption.

4. On or about August 27, 2001 while the plaintiff was a patron at defendant's pharmacy, she caused a drug prescription to be filled out at said pharmacy.

5. The plaintiff ingested the drugs purchased from the defendant relying upon the defendant's warranty that the drugs she was ingesting were the drugs prescribed by her physician but, in fact, the drugs given to her by the defendant pharmacy and ingested by her according to the instructions printed by the defendant on the prescription bottle, were not, in fact, the drugs prescribed by her physician.

6. Upon the plaintiff's ingestion of the drugs given to her by the pharmacy, and as a direct and proximate result of ingesting said drugs, the plaintiff became violently ill, was caused to expend money for medical care and attention, was caused to require emergency room admission, was caused to be incapacitated from earning her livelihood, was caused lasting and permanent injuries, was caused loss of enjoyment of life, and was caused great mental anguish and was caused to be otherwise greatly damaged.

7. The plaintiff having at all times relied on the defendant's express and implied warranties that the drugs she was given by the defendant were the drugs prescribed by her physician, the plaintiff ingested said drugs and was caused to become violently ill, and was caused to expend money for medical care and attention and was caused to require emergency room admission and was caused to be incapacitated from earning her livelihood and was caused lasting and permanent injuries and was caused great mental anguish and was caused to be otherwise greatly damaged.

WHEREFORE, the plaintiff demands judgment against the defendant, MC WOONSOCKET, INC., in an amount to be determined by the Court plus interest and costs of this action.

COUNT II
AS AGAINST MC WOONSOCKET, INC., IN NEGLIGENCE

1. The Plaintiff, JUDITH FONSECA, is a resident of Fall River, Bristol County, and Commonwealth of Massachusetts.

2. The Defendant, MC WOONSOCKET, INC., is a foreign corporation organized under the laws of the state of Rhode Island with a principal place of business at 50 Service Avenue, Warwick, Rhode Island and with a registered agent in Rhode Island namely Parasearch, Inc., 222 Jefferson Boulevard, Suite 200, Warwick, RI.

3. The defendant was on August 27, 2001 and all dates relevant hereto was engaged in the ownership, operation and control of a pharmacy at 933 Pleasant Street, Fall River, Bristol County, Massachusetts, where it offered for sale prescription drugs for human consumption.

4. On or about August 27, 2001 while the plaintiff was a patron at defendant's pharmacy, she caused a drug prescription to be filled out at said pharmacy.

5. The defendant owed a duty to the plaintiff to exercise reasonable care in filling the plaintiff's prescription, in insuring that the medication provided to the plaintiff by the defendant was the same medication prescribed by her physician, in providing the plaintiff with the same instructions for ingesting the medication as those prescribed by her physician and, furthermore, the defendant owed a general duty to the plaintiff to exercise reasonable care under the circumstances so as to adequately protect the plaintiff from foreseeable harm.

6. The plaintiff ingested the drugs purchased from the defendant relying upon the defendant's duty to exercise reasonable care in filling the prescription as the plaintiff's physician wrote it and in taking reasonable measures to ensure that the drugs she was ingesting were the drugs prescribed by her physician but, in fact, the drugs given to her by the defendant pharmacy and ingested by her in accordance with the instructions printed by the defendant on the prescription bottle were not, in fact, the drugs prescribed by her physician.

7. Upon the plaintiff's ingestion of the drugs given to her by the pharmacy, and as a direct and proximate result of ingesting said drugs, the plaintiff became violently ill, was caused to expend money for medical care and attention, was caused to require emergency room admission, was caused to be incapacitated from earning her livelihood, was caused lasting and permanent injuries, was caused loss of enjoyment of life, and was caused great mental anguish and was caused to be otherwise greatly damaged.

8. The defendant breached its duty to exercise reasonable care in filling the plaintiff's prescription by negligently giving the wrong medication to the plaintiff and said

SAHADY ASSOCIATES, P.C.
COUNSELLORS at LAW
399 NORTH MAIN STREET
FALL RIVER,
MASSACHUSETTS 02720

TEL: (508) 674-9444
FAX: (508) 674-8430

negligence of the defendant was the direct and proximate cause of all the plaintiff's damages hereinabove and herein below mentioned.

9. As a direct and proximate result of the negligence of the defendant, the plaintiff was caused to expend money for medical care and attention and was caused to require emergency room admission and was caused to be incapacitated from earning her livelihood and was caused her lasting and permanent injuries and was caused great mental anguish and was caused to be otherwise greatly damaged.

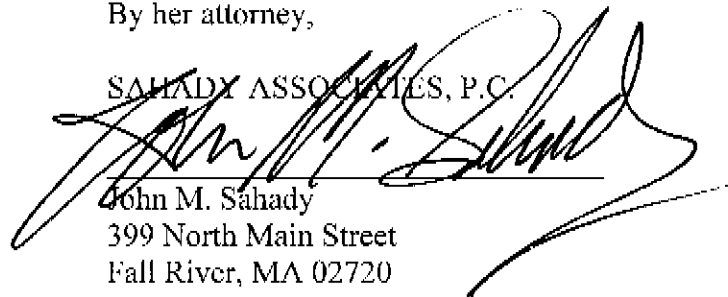
WHEREFORE, the plaintiff demands judgment against the defendant, MC WOONSOCKET, INC., in an amount to be determined by the Court plus interest and costs of this action.

PLAINTIFF DEMANDS TRIAL BY JURY

Respectfully submitted,

By her attorney,

SAHADY ASSOCIATES, P.C.



John M. Sahady
399 North Main Street
Fall River, MA 02720
(508) 674-9444
BBO #437820

Dated: August 27, 2004

SAHADY ASSOCIATES, P.C.
COUNSELLORS at LAW
399 NORTH MAIN STREET
FALL RIVER,
MASSACHUSETTS 02720

TEL: (508) 674-9444
FAX: (508) 674-8430

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

1. TITLE OF CASE (NAME OF FIRST PARTY ON EACH SIDE ONLY)

Judith Fonseca
vs. Brodes Pharmacy, Inc. and MC Woonsocket, Inc.

2. CATEGORY IN WHICH THE CASE BELONGS BASED UPON THE NUMBERED NATURE OF SUIT CODE LISTED ON THE CIVIL COVER SHEET. (SEE LOCAL RULE 40.1(A)(1)).

I. 160, 410, 470, R.23, REGARDLESS OF NATURE OF SUIT.

II. 195, 368, 400, 440, 441-444, 540, 550, 555, 625, 710, 720, 730, 740, 790, 791, 820*, 830*, 840*, 850, 890, 892-894, 895, 950.

*Also complete AO 120 or AO 121
for patent, trademark or copyright cases

X III. 110, 120, 130, 140, 151, 190, 210, 230, 240, 245, 290, 310, 315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 370, 371, 380, 385, 450, 891.

IV. 220, 422, 423, 430, 460, 510, 530, 610, 620, 630, 640, 650, 660, 690, 810, 861-865, 870, 871, 875, 900.

V. 150, 152, 153.

3. TITLE AND NUMBER, IF ANY, OF RELATED CASES. (SEE LOCAL RULE 40.1(G)). IF MORE THAN ONE PRIOR RELATED CASE HAS BEEN FILED IN THIS DISTRICT PLEASE INDICATE THE TITLE AND NUMBER OF THE FIRST FILED CASE IN THIS COURT.

4. HAS A PRIOR ACTION BETWEEN THE SAME PARTIES AND BASED ON THE SAME CLAIM EVER BEEN FILED IN THIS COURT?

YES

NO

5. DOES THE COMPLAINT IN THIS CASE QUESTION THE CONSTITUTIONALITY OF AN ACT OF CONGRESS AFFECTING THE PUBLIC INTEREST? (SEE 28 USC §2403)

YES

NO

IF SO, IS THE U.S.A. OR AN OFFICER, AGENT OR EMPLOYEE OF THE U.S. A PARTY?

YES

NO

6. IS THIS CASE REQUIRED TO BE HEARD AND DETERMINED BY A DISTRICT COURT OF THREE JUDGES PURSUANT TO TITLE 28 USC §2284?

YES

NO

7. DO ALL OF THE PARTIES IN THIS ACTION, EXCLUDING GOVERNMENTAL AGENCIES OF THE UNITED STATES AND THE COMMONWEALTH OF MASSACHUSETTS ("GOVERNMENTAL AGENCIES"), RESIDING IN MASSACHUSETTS RESIDE IN THE SAME DIVISION? - (SEE LOCAL RULE 40.1(D)).

YES

NO

A. IF YES, IN WHICH DIVISION DO ALL OF THE NON-GOVERNMENTAL PARTIES RESIDE?

EASTERN DIVISION

CENTRAL DIVISION

WESTERN DIVISION

B. IF NO, IN WHICH DIVISION DO THE MAJORITY OF THE PLAINTIFFS OR THE ONLY PARTIES, EXCLUDING GOVERNMENTAL AGENCIES, RESIDING IN MASSACHUSETTS RESIDE?

EASTERN DIVISION

CENTRAL DIVISION

WESTERN DIVISION

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME

ADDRESS

TELEPHONE NO.

(Cover sheet local.wpd - 11/27/00)

JS-44 (Rev. 3/99)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Judith Fonseca

DEFENDANTS

Brooks Pharmacy, Inc.
50 Service Avenue, Warwick, RI(b) County of Residence of First Listed Plaintiff Bristol
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Rhode Island
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)

John M. Sahady, Esquire
399 North Main Street
Fall River, MA 02720

Attorneys (If Known)

04-11870 WGY

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☒ DEF ☐ 1 Incorporated or Principal Place of Business in This State ☐ 4 DEF ☐ 4
- Citizen of Another State ☐ 2 ☐ 2 Incorporated and Principal Place of Business in Another State ☐ 5 ☒ 5
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Motor Vehicle <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of <input type="checkbox"/> 160 Unemployment Act <input type="checkbox"/> 170 Recovery of Defuncted Student Loans (Excl. Veterans) <input type="checkbox"/> 180 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 190 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 365 Personal Injury—Med. Malpractice <input checked="" type="checkbox"/> 365 Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (13 USC) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIW (C/DIW W (405 (g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405 (g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 990 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 230 Eminent Domain <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 490 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 990 Other Statutory Actions	

V. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

(Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions)

JUDGE

DOCKET NUMBER

DATE August 27, 2004SIGNATURE OF ATTORNEY OF RECORD John M. Sahady

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

SAHADY ASSOCIATES, P.C.

C o u n s e l l o r s a t L a w

Michael S. Sahady
John M. Sahady
Paul M. Sahady

399 North Main Street
Fall River, MA 02720

Tel. 508-674-9444 Fax 508-674-8430

August 27, 2004

United States District Court
John Joseph Moakley
United States Courthouse
1 Courthouse Way, Suite 2300
Boston, MA 02210

04 - 11870 WGY

RE: JUDITH FONSECA
VS: BROOKS PHARMACY, INC., and
MC WOONSOCKET, INC.

Dear Sir or Madam:

With regard to the above-entitled matter, I am herewith enclosing the following documents for your filing with the court:

1. Complaint and Demand for Trial By Jury;
2. Civil Cover Sheets; and
3. Check in the amount of \$150.00 for the filing fee.

Thank you for your kind cooperation.

Very truly yours,

SAHADY ASSOCIATES, P.C.

By 

John M. Sahady

JMS/sm

Enclosures

HAND DELIVERED